

Declaration of John Hwang
March 3, 2023

I, John Hwang, declare under penalty of perjury that the following statements are true and correct:

1. I founded Rainier Arms and am its current CEO.
2. Rainier Arms, LLC (“Rainier”) is a private corporation headquartered and with principal place of business in the State of Washington. Rainier is in the business of selling a wide variety of firearms and firearm parts and accessories to customers nationwide, including customers in this District. Most of Rainier’s business is conducted via the internet.
3. Rainier sells arm braces and brace-equipped firearms (“arm brace products”). This aspect of Rainier’s business is longstanding, substantial in economic magnitude, a significant driver of customer good will, and critical to the company’s overall financial health.
4. Rainier’s arm brace products are designed and manufactured by well-established third-party firms such as A3 Tactical and SB Tactical, whose current arm brace offerings are generally representative of Rainier’s arm brace products. Specific representative examples of Rainier’s arm brace products include the “SB TACTICAL SOB BRACE BLACK,” the “SB TACTICAL SBA3 PISTOL STABILIZING BRACE,” the “SB TACTICAL SBM47 AK47/74 BRACE,” the “A3 TACTICAL ALUMINUM OFFSET MODULAR SIDE FOLDING STEADY ARM BRACE,” and the “SIG SAUER MCX / MPX PIVOTING CONTOUR BRACE.”
5. The Arm Brace Rule injures Rainier concretely and substantially. In particular, the Arm Brace Rule injures Rainier by imposing substantial economic losses. Immediately upon issuance, the Arm Brace Rule deprived Rainier of substantial profits by causing customers to cancel then-pending orders; and ever since its issuance, the Arm Brace Rule has deprived Rainier of substantial profits by making otherwise willing customers either legally ineligible or practical incapable of using Rainier’s arm brace products. The Arm Brace Rule also injures Rainier by depriving it of customer good will, as its products have now arguably triggered onerous federal firearms regulations. The Arm Brace Rule also injured and continues to injure Rainier by forcing it to incur substantial unrecoverable compliance costs.
6. I executed this declaration on March 3, 2023.



John Hwang